

**Federal Defenders
OF NEW YORK, INC.**

Southern District
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September 9, 2022

By ECF

The Honorable Vernon S. Broderick
United States District Judge
Southern District of New York
40 Centre Street
New York, NY 10007

**APPLICATION GRANTED
SO ORDERED** 
VERNON S. BRODERICK
U.S.D.J. 09/13/2022

**Re: United States v. Sayfullo Saipov
(S1) 17 Cr. 722 (VSB)**

The parties shall update the Court by
September 16, 2022 regarding their joint
proposals for the penalty-phase materials.

Dear Judge Broderick,

I write on behalf of the parties with respect to the September 9, 2022, deadline for the filing of proposed jury instructions and voir dire questions. Dkt. No. 553. Enclosed please find proposed pre-voir dire instructions with annotations from both parties and a joint document containing preliminary voir dire questions for the Court's consideration. The parties remain engaged in productive discussions regarding joint proposals for the penalty-phase materials, and request an extension of time until September 16, 2022, to update the Court as to those items. With respect to liability-phase proposed instructions, the parties will file separately this evening.

Respectfully Submitted,

/s/
David E. Patton, Esq.

Counsel for Sayfullo Saipov